

REMARKS

Applicants have reviewed the Office Action dated November 14, 2005 (hereinafter "Office Action"), and the references cited therewith.

Claims 1, 2, 3, 4, 6, 10, 11, 16, 27, 29, 33, and 34 are amended, claims 7, 25, and 26 are canceled, and claims 35, 36, and 37 are added; as a result, claims 1-6, 8-24, and 27-37 are now pending in this application. Applicants submit that the amendments and additions to the claims are fully supported by the specification as originally filed, and no new matter has been added.

Applicants hereby respectfully request further examination and reconsideration of the application in view of the following remarks.

Information Disclosure Statement

Applicants submitted an Information Disclosure Statement and a 1449 Form on November 3, 2005. Applicants respectfully request that initialed copies of the 1449 Form be returned to Applicants' Representatives to indicate that the cited references have been considered by the Examiner.

§102 Rejection of the Claims

Claims 1-6, 8, 9-24, 27 and 29-34 were rejected under 35 U.S.C. § 102(b) as being anticipated by Iwaszkiewicz et al. (U.S. Patent No. 4,590,950). Applicants respectfully traverse such rejections on the basis that the Office Action failed to make out a *prima facie* case of anticipation on at least the following grounds.

Anticipation requires that the claimed subject matter be *identically* disclosed in the prior art. *In re Arkley*, 172 U.S.P.Q. 524, 526 (C.C.P.A. 1972)(emphasis added). The reference relied upon must teach or suggest *all* the elements and/or limitations of the claims. See *In re Wilson*, 424 F.2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)(stating "[*all*] words in a claim must be considered in judging the patentability of that claim against the prior art")(emphasis added).

"In constructing a rejection based on anticipation, the Examiner must identify the elements of the claims of the application, determine their meaning in light of the specification and prosecution history, and identify the corresponding elements disclosed in the allegedly

anticipating reference.” *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 U.S.P.Q. 481, 485 (Fed. Cir.1984).

To establish inherency, the extrinsic evidence “must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill.” *Continental Can Co. USA v. Monsanto Co.*, 948 F.2d 1264, 1268, 20 U.S.P.Q.2d 1746, 1749 (Fed. Cir.1991).

Claims 1-6 and 8-9:

Applicants submit the Office Action has failed to make out a *prima facie* case of anticipation for claims 1-6 and 8-9 because, among other things, all claim elements and/or limitations cannot be found in the cited reference (Iwaszkiewicz), as required by *In re Arkley* at p. 526, and because corresponding elements to Applicants’ claimed elements have not been identified in Iwaszkiewicz, as required by *Lindemann* at p. 485.

Claim 1:

Among other things, Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz, “[a] lead assembly comprising . . . an inner electrode coupled with at least half of a circumference of the at least one conductor along a portion of an inner electrode length, the inner electrode defined in part by an inner electrode inner surface, an inner electrode outer surface and inner electrode end surfaces,” as recited in Applicants’ claim 1. Rather, as the Office Action points out, “Iwaszkiewicz discloses, ‘. . . a conductive bridge is provided, one end of which is in electrical contact with said first conductor and the other end of which projects through an aperture in said insulating means . . . the conductive bridge may comprise a wire 20 . . .’” (Col. 3, Ins. 38-43). Iwaszkiewicz further recites “the ends of the bridging wire [are] respectively clamped by compression fit.” (Abstract, *see also* FIG. 2). Applicants submit that each conductive bridge wire as recited in Iwaszkiewicz will not “couple[] with at least half of a circumference of the at least one conductor along a portion of an inner electrode length,” as claimed by Applicants, but rather will compressively clamp onto first conductor 19 along a longitudinal line of contact.

Because all elements and/or limitations of Applicants’ claim 1 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 1. Claims 2-9

are dependent on claim 1 and are patentable over Iwaszkiewicz for the reasons stated above, in addition to the elements in such claims.

Claims 2, 3, and 8:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 1-9 (of which claims 2, 3, and 8 are included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly “wherein the inner electrode and the outer electrode are coupled together along at least one coupling projection extending between the inner electrode outer surface and the outer electrode inner surface,” as recited in Applicants’ claim 2. The Office Action assertion that “the upper portion of element 20, just left of the upward bend, towards element 11 [is] the coupling projection” fails to meet the elements and/or limitations of Applicants’ claim 2. (Office Action, p. 3). As one example, Applicants direct the Examiner’s attention to FIG. 3 of Iwaszkiewicz which illustrates a bridging wire element 20 having a uniform cross-sectional profile. In brief, upper portion is not (and does not include) a “coupling projection extending between the inner electrode outer surface and the outer electrode inner surface,” as claimed by Applicants.

Because all elements and/or limitations of Applicants’ claim 2 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 2. Claims 3 and 8, among others, are dependent on claim 2 and are patentable over Iwaszkiewicz for the reasons stated above, in addition to the elements in such claims.

Claim 4:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 1-9 (of which claim 4 is included) and claims 2 and 3 specifically (from which claim 4 depends), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly “wherein the at least one coupling projection is defined in part by a projection outer surface, the projection outer surface including alignment features thereon,” as recited in Applicants’ claim 4. When read in conjunction with claim 2, claim 4 recites a projection outer surface including alignment features thereon, which is distinct from the inner electrode outer surface or the outer electrode inner surface. The Office Action assertion that “the projection formed from element 20 . . . has a top surface that contains two edges . . . [which] act as an

alignment means” fails to meet the elements and/or limitations of Applicants claim 4. (Office Action, p. 3).

Because all elements and/or limitations of Applicants’ claim 4 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 4.

Claim 5:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 1-9 (of which claim 5 is included) and claims 2, 3, and 4 specifically (from which claim 5 depends), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly “wherein the outer electrode includes one or more outer electrode alignment features therein,” as recited in Applicants’ claim 5. The Office Action assertion that “the outer electrode has two terminal edges, which can be used to align the electrode . . . [and] [t]herefore, the outer electrode inherently contains alignment features to aid in the positioning of the electrode” fails to meet the limitation “therein” as found in Applicants’ claim 5. (Office Action, p. 4). Furthermore, inherency has not been established as Iwaszkiewicz does not make clear that the missing subject matter is necessary present in such cited reference, as required by *Continental Can Co.* at p. 1268.

Because all elements and/or limitations of Applicants’ claim 5 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 5.

Claim 6:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 1-9 (of which claim 6 is included) and claims 2, 3, 4, and 5 specifically (from which claim 6 depends), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly “wherein the outer electrode alignment features includes at least one sight hole extending from an outer electrode outer surface to the outer electrode inner surface,” as recited in Applicants’ claim 6. The Office Action asserts that “[s]ince the ring electrode contains a hole through which the lead is passed in order to aid in the positioning of the electrode, the electrode contains a sight hole, which is used as an alignment feature.” (Office Action, p.4). Such Office Action assertion not only fails to meet the elements and/or limitations of Applicants’ claim 6, but it also evidences a failure by the Office Action to meet numerous anticipation requirements,

including identifying Applicants' claimed elements and determining the meaning of such claimed elements from the specification, as required by *Lindemann Maschinenfabrik GmbH* at p. 485. Furthermore, as a practical matter, Applicants submit that the ring through-hole does not provide any external sight during the positioning of the ring (electrode) as the lead fills the hole at such time.

Because all elements and/or limitations of Applicants' claim 6 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 6.

Claim 9:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 1-9 (of which claim 9 is included) and claim 2 specifically (from which claim 9 depends), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly "wherein the inner electrode extends from a first end to a second end, and the at least one coupling projection extends substantially from the first end to the second end," as recited in Applicants' claim 9.

Because all elements and/or limitations of Applicants' claim 9 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 9.

Claims 10-15:

Applicants submit the Office Action has failed to make out a *prima facie* case of anticipation for claims 10-15 because, among other things, all claim elements and/or limitations cannot be found in Iwaszkiewicz, as required by *In re Arkley* at p. 526.

Claims 10, 13, and 14:

Among other things, Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz "[a] lead assembly comprising . . . an inner ring electrode coupled with at least one conductor, the inner ring electrode defined in part by an inner electrode inner surface, an inner electrode outer surface and inner electrode end surfaces," as recited in Applicants' claim 10. Rather, as the Office Action points out, "Iwaszkiewicz discloses, ' . . . a conductive bridge is provided, one end of which is in electrical contact with said first conductor and the other end of which projects through an aperture in said insulating means . . . the conductive bridge may

comprise a wire 20 . . .” (Col. 3, lns. 38-43). Iwaszkiewicz further recites “the ends of the bridging wire being respectively clamped by compression fit.” (Abstract, *see also* FIG. 2). Applicants submit that each wire conductive bridge as recited in Iwaszkiewicz is not “an inner ring electrode coupled with the at least one conductor,” as claimed by Applicants.

Additionally, Applicants cannot find in Iwaszkiewicz “a lead assembly comprising . . . the inner ring electrode and the outer electrode coupled together along at least one non-annular coupling projection disposed between the inner electrode and the outer electrode,” as further recited in Applicants’ claim 10. The Office Action asserts “the upper portion of element 20, just left of the upward bend, towards element 11 [is] the coupling projection;” however, such position fails to meet the elements and/or limitations of Applicants’ claim 10 as the “coupling projection” (asserted by the Office Action to be a portion of the inner electrode) cannot also be disposed between the inner electrode and the outer electrode as claimed by Applicants. (Office Action, pp. 3 and 5).

Because all elements and/or limitations of Applicants’ claim 10 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 10. Claims 11-15 are dependent on claim 10 and are patentable over Iwaszkiewicz for the reasons stated above, in addition to the elements in such claims.

Claim 11:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 10-15 (of which claim 11 is included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly “wherein the at least one non-annular coupling projection has a coupling projection length substantially as long as the inner ring electrode,” as recited in Applicants’ claim 11. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 9.

Because all elements and/or limitations of Applicants’ claim 11 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 11.

Claim 12:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 10-15 (of which claim 12 is included), Applicants cannot find (nor has the Office Action

identified) in Iwaszkiewicz a lead assembly “wherein the at least one non-annular coupling projection has a projection length substantially as long as the outer electrode,” as recited in Applicants’ claim 12.

Because all elements and/or limitations of Applicants’ claim 12 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 12.

Claim 15:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 10-15 (of which claim 15 is included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly “wherein the at least one recess is smaller than the at least one non-annular coupling projection,” as recited in Applicants’ claim 15. Rather, Iwaszkiewicz recites “[s]ealing of opening 14a, 14b around the wire . . . may be accomplished by careful application of an adhesive 23 such as Dow Corning Silastic® A.” (Col. 5, lns. 1-4; *see also* col. 4, lns. 51-54; col. 7, lns. 16-19; *see also* FIGS. 3-4).

Because all elements and/or limitations of Applicants’ claim 15 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 15.

Claims 16-22:

Applicants submit the Office Action has failed to make out a *prima facie* case of anticipation for claims 16-22 because, among other things, all claim elements and/or limitations cannot be found in Iwaszkiewicz, as required by *In re Arkley* at p. 526.

Claims 16, 18, and 19:

Among other things, Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz “[a] lead assembly comprising . . . an inner electrode defined in part by an inner electrode inner surface, an inner electrode outer surface, a first end, and a second end, the inner electrode inner surface coupled with, and substantially surrounding, the at least one conductor along a portion of an inner electrode length,” as recited in Applicants’ claim 16. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 1.

Additionally, Applicants cannot find in Iwaszkiewicz “a lead assembly comprising . . . the inner electrode and the outer electrode coupled together along at least one coupling projection disposed between the inner electrode and the outer electrode,” as further recited in Applicants’ claim 16. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to Claim 10.

Because all elements and/or limitations of Applicants’ claim 16 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 16. Claims 17-22 are dependent on claim 16 and are patentable over Iwaszkiewicz for the reasons stated above, in addition to the elements in such claims.

Claim 17:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 16-22 (of which claim 17 is included), Applicants cannot find as lead assembly “wherein the at least one coupling projection has a projection length substantially as long as the outer electrode,” as recited in Applicants’ claim 17. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 12.

Because all elements and/or limitations of Applicants’ claim 17 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 17.

Claim 20:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 16-22 (of which claim 20 is included), Applicants cannot find a lead assembly “wherein the inner electrode includes the at least one coupling projection extending therefrom, as recited in Applicants’ claim 20. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 2.

Because all elements and/or limitations of Applicants’ claim 20 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 20.

Claim 21:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 16-22 (of which claim 21 is included), Applicants cannot find a lead assembly “wherein the at least one coupling projection is defined in part by a projection outer surface, the projection

outer surface including alignment features thereon,” as recited in Applicants’ claim 21. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 4.

Because all elements and/or limitations of Applicants’ claim 21 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 21.

Claim 22:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 16-22 (of which claim 22 is included) and claim 21 specifically (from which claim 22 depends), Applicants cannot find a lead assembly “wherein the outer electrode includes one or more outer electrode alignment features therein,” as recited in Applicants’ claim 22. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 5.

Because all elements and/or limitations of Applicants’ claim 22 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 22.

Claims 23-24:

Applicants submit the Office Action has failed to make out a *prima facie* case of anticipation for claims 23-24 because, among other things, all claim elements and/or limitations cannot be found in Iwaszkiewicz, as required by *In re Arkley* at p. 526, and because corresponding elements to the claimed elements have not been identified in Iwaszkiewicz, as required by *Lindemann* at p. 485.

Claim 23:

Among other things, Applicants cannot find in Iwaszkiewicz “[a] lead assembly comprising . . . means for aligning the outer electrode with the inner electrode for the coupling process,” as recited in Applicants’ claim 23. The Office Action asserts “the openings 14a and 14b are used as alignment means for aligning the outer and inner electrodes,” (Office Action, p. 6); however, Applicants submit that openings 14a and 14b cannot be used for such alignment as the openings are not visible when the ring (i.e., the outer conductor) is moved over the bridging wire (i.e., the inner conductor).

Because all elements and/or limitations of Applicants' claim 23 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 23. Claim 24 is dependent on claim 23 and is patentable over Iwaszkiewicz for the reasons stated above, in addition to the elements in such claim.

Claim 24:

In addition to the foregoing reasons supporting a finding of patentability of claims 23-24 (of which claim 24 is included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a lead assembly "wherein the outer electrode includes a sight hole therein," as recited in Applicants' claim 24. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 6.

Because all elements and/or limitations of Applicants' claim 24 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 24.

Claims 27 and 29-34:

Applicants submit the Office Action has failed to make out a *prima facie* case of anticipation for claims 27 and 29-34 because, among other things, all claim elements and/or limitations cannot be found in Iwaszkiewicz, as required by *In re Arkley* at p. 526.

Claims 27 and 30-32:

Among other things, Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz "[a] method comprising . . . coupling the outer electrode with the inner electrode, including coupling along at least one coupling projection extending between the inner surface of the outer electrode and the outer surface of the inner electrode," as recited in Applicants' claim 27. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 2.

Because all elements and/or limitations of Applicants' claim 27 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 27. Claims 29-34 are dependent on claim 27 and are patentable over Iwaszkiewicz for the reasons stated above, in addition to the elements in such claims.

Claim 29:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 27 and 30-34 (of which claim 29 is included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a method “further comprising aligning the outer electrode with the inner electrode prior to coupling the outer electrode with the inner electrode, including using alignment features disposed on an outer surface of the at least one projection,” as recited in Applicants’ claim 29. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 4.

Because all elements and/or limitations of Applicants’ claim 29 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 29.

Claim 33:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 27 and 30-34 (of which claim 33 is included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a method “wherein coupling the outer electrode with the inner electrode includes coupling the outer electrode with a coupling projection extending outward from the outer surface of the inner electrode,” as recited in Applicants’ claim 33. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 8.

Because all elements and/or limitations of Applicants’ claim 33 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 33.

Claim 34:

In addition to the foregoing reasons set forth supporting a finding of patentability of claims 27 and 30-34 (of which claim 34 is included), Applicants cannot find (nor has the Office Action identified) in Iwaszkiewicz a method “wherein coupling the outer electrode with the inner electrode includes coupling the outer electrode with a non-annular coupling projection extending outward from the outer surface of the inner electrode,” as recited in Applicants’ claim 34. To this end, Applicants hereby incorporate by reference the relevant arguments stated above with respect to claim 3.

Because all elements and/or limitations of Applicants' claim 34 cannot be found in Iwaszkiewicz, Applicants respectfully request withdrawal of the rejection of claim 34.

§103 Rejection of the Claims

Claim 28 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Iwaszkiewicz et al. (U.S. Patent No. 4,590,950) in view of Wessman et al. (U.S. Patent No. 6,952,616). Applicants respectfully traverse such rejection and submit that the Office Action has not made out a *prima facie* case of obviousness.

To establish a *prima facie* case of obviousness, three criteria must be met.

First, there must be some suggestion or motivation, either in the cited reference(s), or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. M.P.E.P. § 2142 (citing *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d (BNA) 1438 (Fed. Cir. 1991)). According to *In re Lee*, “there must be some motivation, suggestion, or teaching of the desirability of making the specific combination that was made by the applicant.” 61 U.S.P.Q.2d 1430 (Fed. Cir. 2002)(citing *In re Fine*), *see also ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984)(holding “[o]bviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination”).

A factor cutting against a finding of motivation to combine or modify the prior art is when the prior art teaches away from the claimed combination. A reference should be considered as a whole, and portions arguing against or teaching away from the claimed invention must be considered. *Bausch & Lomb, Inc. v. Barnes-Hind/Hydrocurve, Inc.*, 796 F.2d 443, 230 U.S.P.Q. 416 (Fed. Cir. 1986).

Second, the prior art reference(s) must teach or suggest all of the claim elements and/or limitations. M.P.E.P. § 2142.

Third, there must be a reasonable expectation of success. M.P.E.P. § 2142.

Claim 28:

Applicants submit the Office Action has failed to make out a *prima facie* case of obviousness for claim 28 because, among other things, there is legally insufficient motivation to combine the cited references (Iwaszkiewicz and Wessman).

Using Iwaszkiewicz and Wessman (e.g., without the use of the Applicants' disclosure), one of ordinary skill in the art would not have been motivated to combine the teachings of such references to produce a method "wherein coupling the outer electrode with the inner electrode includes welding the outer electrode to the inner electrode," as recited in Applicants' claim 28.

Applicants submit that Iwaszkiewicz teaches against being combined with the "method of welding the inner electrode to the outer electrode" of Wessman. (Office Action, p. 8).

Iwaszkiewicz recites "[w]elded or swaged designs may cause damage to the ring electrode surface during construction thereof, which also increases the possibility of thrombus formation . . . [furthermore,] [w]elded and particularly swaged electrode ring assemblies also reduce lead flexibility in the area immediately adjacent to the ring." (Col. 1, lns. 54-59). Iwaszkiewicz goes on to recite "[i]t is therefore an object of the present invention to construct a pacemaker lead having a smooth outer profile, continuous insulation and a high degree of flexibility proximate the electrode ring." (Col. 1, lns. 62-65).

Because no legally sufficient motivation to combine the subject matter of Iwaszkiewicz with the subject matter of Wessman has been provided, Applicants respectfully request withdrawal of the rejection of claim 28.

Allowable Subject Matter

Applicants have rewritten claims 7, 25, and 26 (as claims 35, 36, and 37, respectively) to incorporate the elements and/or limitations of their base and any intervening claims. Reconsideration and allowance of claims 35, 36, and 37 is respectfully requested.

CONCLUSION

Applicants respectfully submit that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicants' attorney at (612) 359-3276 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

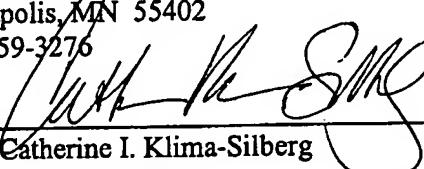
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By their Representatives,

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By _____


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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 14 day of March, 2006.

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Name

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